

1 WILLIAM BLUMENTHAL
General Counsel

2 JANICE L. CHARTER Colo. Bar No. 12750
3 DAVID M. NEWMAN Cal. Bar No. 54218
4 THOMAS DAHDOUH N.Y. Bar No. 2222370
Federal Trade Commission
901 Market Street, Suite 570
5 San Francisco, CA 94103
Phone (415) 848-5100/ Fax (415) 848-5184
6 jcharter@ftc.gov; dnewman@ftc.gov; tdahdouh@ftc.gov

7 ATTORNEYS FOR PLAINTIFF
FEDERAL TRADE COMMISSION

8
9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 FEDERAL TRADE COMMISSION,

13 Plaintiff,

14 v.

15 NEXTCLICKMEDIA, LLC, *et al.*,

16 Defendants.

Case No. C08-1718-VRW

STIPULATION FOR ORDER
EXTENDING DEADLINE FOR FILING
RESPONSIVE PLEADINGS AND
PROPOSED ORDER

17
18
19
20 WHEREAS, Defendants NextClickMedia, LLC's, Next Internet, LLC's, Kenneth
21 Chan's and Albert Chen's (collectively, "Defendants") response to Plaintiff Federal Trade
22 Commission's (the "FTC") Complaint is currently due on Monday, June 30, 2008;

23 WHEREAS, the parties to this action have entered into an exchange of information with
24 the intention of exploring the possibility of settlement of this matter;

25 WHEREAS, the FTC is willing to extend the time for Defendants to file their responses
26 to Plaintiff's Complaint in order to focus on settlement discussions; and

27 WHEREAS the parties believe that additional time will increase the likelihood that they
28 will be able to reach a settlement of this matter;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the FTC and Defendants, through their respective counsel, that Defendants' time to move, answer or otherwise respond to the Complaint shall be and hereby is extended to and including September 30, 2008; and

IT IS FURTHER STIPULATED that the Case Management Conference, currently scheduled for July 10, 2008, at 3:30 p.m., be rescheduled to October 16, 2008, at 3:30 p.m., and that the date for filing the Case Management Statement be extended to October 9, 2008.

Dated: 6/11/08

/s/

LEWIS ROSE
D. REED FREEMAN
MICHAEL C. LYNCH
KELLEY DRYE & WARREN
ATTORNEYS FOR DEFENDANTS

Dated: 6/11/08

/s/

JANICE L. CHARTER
DAVID M. NEWMAN
THOMAS N. DAHDOUN
ATTORNEYS FOR PLAINTIFF

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 17, 2008

